

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

FIESTA MART, LLC.

Plaintiff,

v.

**WILLIS OF ILLINOIS, INC. and
WILLIS TOWERS WATSON US, LLC**

Defendants.

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Civil Action No. 4:20-cv-03484

**DEFENDANTS WILLIS TOWERS WATSON MIDWEST, INC., F/K/A WILLIS OF
ILLINOIS, INC. AND WILLIS TOWERS WATSON US LLC'S RESPONSE TO ORDER
TO SHOW CAUSE CONCERNING REMOVAL**

Defendants Willis Towers Watson Midwest, Inc., f/k/a Willis of Illinois, Inc. and Willis Towers Watson US LLC (collectively, "Willis"), by and through the undersigned counsel, hereby file this response to the Court's January 7, 2021 Order to Show Cause Concerning Removal (Dkt. 6), stating as follows:

1. Willis first received a copy of the state court action complaint on September 10, 2020.
2. Willis was served with a copy of the state court action complaint and summons on September 14, 2020.
3. Willis understands that Fiesta Mart, LLC is a citizen of the state of Texas.
4. Although the complaint does not identify a specific amount that Plaintiff is seeking to recover, Plaintiff alleges that "Willis' breach of contract has resulted in millions of dollars in losses for Fiesta Mart." This amount exceeds \$75,000, as required under 28 U.S.C. §1332(a).
5. N/A. Willis filed its Notice of Removal on October 9, 2020, within 30 days upon first receiving a copy of the state court action complaint.
6. N/A. *See* Response to No. 5.

7. None.

8. Willis Towers Watson US LLC is a limited liability company organized under the laws of Delaware and has its principal place of business at 800 N. Glebe Road, Arlington, Virginia 22203. Willis Towers Watson US LLC's sole shareholder is Towers Watson Delaware Holdings LLC, a Delaware limited liability company with its principal place of business in Virginia. Towers Watson Delaware Holdings LLC's sole shareholder is WTW Delaware Holdings LLC, a Delaware limited liability company with its principal place of business in Delaware. WTW Delaware Holdings LLC's sole shareholder is Willis US Holding Company, LLC, a Delaware limited liability company with its principal place of business in Delaware. Willis US Holding Company, LLC's sole shareholder is Willis North America Inc., a company incorporated under the laws of Delaware and with its principal place of business in New York. Willis is thus a citizen of Delaware, Virginia, and New York for diversity jurisdiction purposes.

Defendant Willis Towers Watson Midwest, Inc., f/k/a Willis of Illinois, Inc., is a corporation organized under the laws of Illinois, and has a principal place of business at 233 S. Wacker Drive, Suite 2000, Chicago, IL 60606. It is thus a citizen of Illinois for diversity jurisdiction purposes.

Plaintiff Fiesta Mart, LLC is a Texas Limited Liability Company with its principal place of business in Houston, Texas. Fiesta Mart, LLC is owned 100% by Fiesta Mart Holdings, LLC, which is 100% owned by Fiesta Mart Investments, LLC, which is jointly owned by Fiesta Investors LLC, Fiesta Investors Holdings LLC, and Bodega Latina Corporation. Fiesta Investors LLC and Fiesta Investor Holdings LLC are also owned by Bodega Latina Corporation. All of these entities other than Fiesta Mart, LLC are Delaware LLCs, or in the case of Bodega Latina, a Delaware Corporation.

Respectfully submitted,

MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.

By: /s/ Christopher W. Martin

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**ATTORNEYS FOR DEFENDANTS
WILLIS OF ILLINOIS, INC. and
WILLIS TOWERS WATSON US LLC**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been mailed, e-mailed, telecopied or hand delivered to all attorneys of record, in compliance with the FEDERAL RULES OF CIVIL PROCEDURE, on this the 15th day of January 2021.

/s/Christopher W. Martin
Christopher W. Martin